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13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products  
16 Liability Litigation

No. MD-15-02641-PHX-DGC

**MOTION TO FILE UNDER SEAL**

**(Filed *Ex Parte*)**

19 Plaintiffs' Co-Lead Counsel and Liaison Counsel to the Common Benefit Fee and  
20 Cost Committee and the Co-Chairs of the Common Benefit Fee and Cost Committee  
21 respectfully move this Court, pursuant to Federal Rule of Civil Procedure 26(c)(1)(G) and  
22 Local Civil Rule 5.6 for leave to file under seal Transcript Request (Doc. 22113,  
23 "Request") because the Request pertains to a confidential hearing. Accordingly, good  
24 cause exists for sealing the Request.

1  
2 RESPECTFULLY SUBMITTED this 24<sup>th</sup> day of September 2021.

3 BEUS GILBERT MCGRODER PLLC

4  
5 By: /s/ Mark S. O'Connor

6 Mark S. O'Connor

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27 *Committee*  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24<sup>th</sup> day of September 2021, I electronically transmitted the attached document to the Court.

/s/ Jessica Gallentine